



Northwest Concrete Masonry Association

March 11, 2022

Mr. Andrew Klein, Chair
Washington State Building Code Council
PO Box 41449
Olympia, WA 98504-1449

Mr. Chairman and Council Members:

I am the Director of the Northwest Concrete Masonry Association. Our industry is opposed to IBC proposal GP1-80 which would allow fire walls to be constructed with combustible materials in Type III/IV buildings. This is currently not permitted by the code.

The proponent's primary reason for the proposal is potential differential movement between dissimilar materials. This is an issue that can be addressed through proper design and detailing and is not a valid reason to reduce the fire resistance or performance of building fire walls.

Fire walls are a major component of fire-safe building design. ICC voted to "disapprove" a similar proposal to this one with the committee stating, "there seems to be a lot of performance uncertainty," preferring to be careful with allowances for Type III/IV construction. Keep in mind, the "performance uncertainty" they mention relates to fire performance ---as it should -- not concerns with potential shrinkage between dissimilar materials.

The proponent further states that "combustible fire walls would perform better than noncombustible walls." This is hard to comprehend and isn't supported by the proposal. Also, the reasoning states that "Seattle has allowed combustible fire walls for these construction types." This is not relevant for a state-wide amendment as most cities in Washington State have neither the fire-fighting resources nor rapid fire response time that Seattle does.

For these reasons we ask the Council to **disapprove** this proposed amendment, maintaining the IBC provision.

We appreciate the opportunity to comment on this proposal.

Sincerely,

Tom Young, P.E. (AZ, CO)
Executive Director